

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TONOPAH SOLAR ENERGY, LLC,¹

Debtor.

Chapter 11

Case No. 20-11884 (KBO)

Re: Docket Nos. 36 and 133

**NOTICE OF FILING REVISED PROPOSED ORDER (I) APPROVING THE
DISCLOSURE STATEMENT; (II) APPROVING SOLICITATION AND VOTING
PROCEDURES, INCLUDING (A) FIXING THE RECORD DATE, (B) APPROVING
THE SOLICITATION PACKAGES AND PROCEDURES FOR DISTRIBUTION,
(C) APPROVING THE FORM OF BALLOT AND ESTABLISHING PROCEDURES
FOR VOTING, AND (D) APPROVING PROCEDURES FOR VOTE TABULATION;
(III) SCHEDULING A CONFIRMATION HEARING AND ESTABLISHING NOTICE
AND OBJECTION PROCEDURES; AND (IV) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT on July 30, 2020, Tonopah Solar Energy, LLC (the “**Debtor**”) filed the *Debtor’s Motion for an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Voting Procedures, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of Ballot and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures; and (IV) Granting Related Relief* [Docket No. 36] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached as Exhibit A to the Motion was a proposed form of order (the “**Proposed Order**”) granting the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE THAT subsequent to the filing of the Motion, the Debtor revised the Proposed Order (the “**Revised Proposed Order**”) to, among

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is Tonopah Solar Energy, LLC (1316). The Debtor’s headquarters is located at 11 Gabbs Pole Line Road, Tonopah, NV 89049.

other things, address informal comments received from the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) and Brahma Group, Inc. (“**Brahma**”). A copy of the Revised Proposed Order is attached hereto as Exhibit A. For the convenience of the Court and other interested parties, a blackline (without exhibits) comparing the Revised Proposed Order against the Proposed Order is attached hereto as Exhibit B. The Revised Proposed Order resolves the U.S. Trustee’s and Brahma’s informal comments.

PLEASE TAKE FURTHER NOTICE THAT the Debtor intends to seek entry of the Revised Proposed Order at the hearing currently scheduled for September 4, 2020 at 10:00 a.m. (ET) (the “**Hearing**”). The Debtor reserves all rights to modify the Revised Proposed Order at or prior to the Hearing.

[Signature page follows]

Dated: September 2, 2020
Wilmington, Delaware

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